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Attorneys for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MEREDITH CALLAHAN AND LAWRENCE  
GEOFFREY ABRAHAM, on behalf of themselves  
and all others similarly situated,

Plaintiff.

V.

**PEOPLECONNECT, INC., a Delaware  
Corporation.**

### Defendants.

Case No. 3:20-cv-09203-EMC

**JOINT STIPULATION TO EXTEND  
DEADLINE FOR PLAINTIFFS' RESPONSE  
TO MOTION TO DISMISS AND CONTINUE  
CASE MANAGEMENT CONFERENCE**

Pursuant to Local Rules 6-1 and 6-2, PeopleConnect, Inc. (“Defendant”) and Meredith Callahan, Lawrence Geoffrey Abraham, on behalf of themselves and others similarly situated (“Plaintiffs”), by and through their undersigned counsel, hereby stipulate to continue the date of the upcoming case management conference, thus extending related deadlines, and to a two-week extension of time for Plaintiffs to respond

**JOINT STIPULATION**  
Case No. 3:20-cv-09203-EMC

1 to Defendant's Motions to Dismiss, Strike, and Stay Discovery and. In support of this stipulation, the  
2 parties stipulate to the following:

3 1. Plaintiffs filed a Class Action Complaint on December 18, 2020 (ECF No. 2). Defendant  
4 filed Motions to Dismiss, Strike, and Stay Discovery ("Motions") on March 19, 2021, noticed to be heard  
5 April 29, 2021 at 1:30 p.m. (ECF No. 26; ECF No. 28).

6 2. The parties currently have upcoming deadlines in April to file an ADR certification, meet  
7 and confer regarding initial disclosures, early settlement, ADR process selection, and discovery plan, file  
8 a joint case management statement, and complete initial disclosures or state objection in the joint case  
9 management statement. The case management conference hearing before this Court currently is set for  
10 Thursday, April 22, 2021 at 9:30 a.m.

11 3. Given Defendant's pending Motions, which include a dispositive motion and a motion to  
12 stay discovery, the parties agree that it would be most efficient to extend the deadlines discussions in  
13 paragraph 2 above.

14 4. For these reasons, upon electronic conferral, the parties agreed to seek a continuance of the  
15 case management conference until the court rules on Defendant's pending Motion to Stay Discovery. If  
16 the Motion to Stay is granted, the case management conference and related dates will be set after the ruling  
17 on the Motion to Dismiss. If the Motion to Stay is denied, the parties request that the Court set the case  
18 management conference for 30 days after such a denial and extend all above referenced deadlines  
19 accordingly.

20 5. This schedule was previously modified by the Case Management Conference Order in  
21 Reassigned Case (ECF No. 8). Defendant waived service, extending Defendant's time to answer or  
22 otherwise plead. (ECF No. 16). No other modifications to the schedule have been requested by the parties.

23 6. The parties further agreed on a two-week extension of time for Plaintiffs to respond to  
24 Defendant's Motion to Dismiss, which would extend Plaintiffs' time to respond to April 16, 2021.

25 The parties therefore respectfully request that this Court grant the below time changes agreed upon  
26 by the parties:

- Continue the case management conference until the court rules on Defendant's pending Motion to Stay Discovery. If the Motion to Stay is granted, the case management conference would be set after the ruling on the Motions to Dismiss and Strike. If the Motion to Stay Discovery is denied, the parties would request that the case management conference for 30 days after such a denial.

- Extend all deadlines related to the case management conference, including deadlines to file ADR Certification, meet and confer regarding initial disclosures, early settlement, ADR process selection, and a discovery plan, file a joint case management statement, and complete initial disclosures or state objection in joint case management statement, to dates to be determined by the date of the continued case management conference.

- Extend the date for Plaintiffs to respond to Defendant's Motions to Dismiss, Strike, and Stay Discovery for two weeks, up to and including April 16, 2021. Reply due April 23, 2021; Hearing to be rescheduled to be heard on 5/13/2021 at 1:30PM.

Dated: March 30, 2021

Dated: March 30, 2021

JENNER & BLOCK LLP

BEN OSBORN LAW

By: /s/ *Kate T. Spelman*

Kate T. Spelman

By: /s/ *Benjamin R. Osborn*

Benjamin R. Osborn

## SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document has been obtained from each of the other Signatories.

Dated: March 30, 2021,

/s/ *Kate T. Spelman*

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Kate T. Spelman

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: March 30, 2021

  
Judge Edward M. Chen  
United States District Judge